

MALCOLM A. HEINICKE (SBN 194174)
Malcolm.Heinicke@mto.com
KATHLEEN M. McDOWELL (SBN 115976)
Kathleen.McDowell@mto.com
J. RAZA LAWRENCE (SBN 233771)
Raza.Lawrence@mto.com
MUNGER, TOLLES & OLSON LLP
560 Mission Street
Twenty-Seventh Floor
San Francisco, CA 94105-2907
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

ATTORNEYS FOR DEFENDANTS

WACHOVIA FINANCIAL SERVICES, INC.; WACHOVIA MORTGAGE CORPORATION; WACHOVIA SHARED RESOURCES, LLC (erroneously sued as Wachovia Services, Inc.); WORLD MORTGAGE COMPANY; WACHOVIA COMMERCIAL MORTGAGE, INC.; WORLD SAVINGS, INC.; WACHOVIA EQUITY SERVICING, LLC; WACHOVIA BANK, N.A.; AND WACHOVIA CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RONALD CHIN, individually, and on behalf of all other similarly situated, and as an aggrieved employee pursuant to the Private Attorneys General Act,

CASE NO. 3:08-cv-01320-MMC

**STIPULATION EXTENDING
DEADLINES TO RESPOND TO
THE COMPLAINT**

Plaintiff,

vs.

WACHOVIA FINANCIAL SERVICES, INC.;
WACHOVIA MORTGAGE CORPORATION;
WACHOVIA SERVICES, INC.; WORLD
MORTGAGE COMPANY; WACHOVIA
COMMERCIAL MORTGAGE, INC.; WORLD
SAVINGS, INC.; WACHOVIA EQUITY
SERVICING, LLC; WACHOVIA BANK, N.A.;
WACHOVIA CORPORATION; and Does 1 through
10, inclusive.

Judge: Hon. Maxine M. Chesney

Defendants.

1 WHEREAS, Plaintiff Ronald Chin brings this action alleging employment claims,
2 and specifically alleging, *inter alia*, that Wachovia Financial Services, Inc., Wachovia Mortgage
3 Corporation, Wachovia Services, Inc., World Mortgage Company, Wachovia Commercial
4 Mortgage, Inc., World Savings, Inc., Wachovia Equity Servicing, LLC, Wachovia Bank, N.A.,
5 and Wachovia Corporation did not pay him and other current and former California hourly
6 employees wages owed for overtime compensation and wages due upon discharge or resignation,
7 did not provide them with meal and rest periods as required by law, and did not comply with
8 wage reporting requirements;

9 WHEREAS, Plaintiff Chin and his counsel have served this complaint on
10 Wachovia Financial Services, Inc., Wachovia Mortgage Corporation, Wachovia Shared
11 Resources, LLC (erroneously sued as its predecessor-in-interest Wachovia Services, Inc.), World
12 Mortgage Company, Wachovia Commercial Mortgage, Inc., World Savings, Inc., and Wachovia
13 Equity Servicing, LLC, and each of these entities' responses is currently due on or about March
14 14, 2008;

15 WHEREAS, counsel for Defendants has agreed to accept service on behalf of
16 Defendants Wachovia Bank, N.A. and Wachovia Corporation and Plaintiff is in the process of
17 effectuating this service;

18 WHEREAS, counsel have conferred and Plaintiff Chin and his counsel have
19 agreed to extend Defendants' response deadlines in this matter, and the extensions agreed upon
20 will not alter any date already set by the Court:

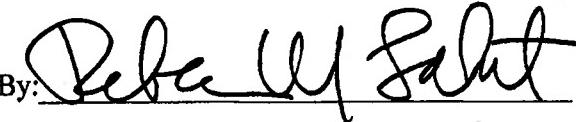
21 IT IS HEREBY STIPULATED pursuant to Civil Local Rule 6-1(a) that the
22 deadlines for Defendants Wachovia Financial Services, Inc., Wachovia Mortgage Corporation,
23 Wachovia Shared Resources, LLC, World Mortgage Company, Wachovia Commercial Mortgage,
24 Inc., World Savings, Inc., Wachovia Equity Servicing, LLC, Wachovia Bank, N.A. and
25 Wachovia Corporation to respond to the complaint are extended as follows:

- 26 1. The deadline for filing an answer to the complaint shall be April 1, 2008;
27 2. The deadline for filing any pre-answer motion or pleading other than an
28 answer shall be March 17, 2008.

- 1 1. The deadline for filing an answer to the complaint shall be April 1, 2008;
2 2. The deadline for filing any pre-answer motion or pleading other than an
3 answer shall be March 17, 2008.

4 DATED: March 13, 2008

5 INITIATIVE LEGAL GROUP LLP
6 MARK YABLONOVICH
7 MARC PRIMO
8 REBECCA LABAT

9
10 By: 

11
12 Attorneys for Plaintiff
13 RONALD CHIN

14 DATED: March _____, 2008

15
16 MUNGER, TOLLES & OLSON LLP
17 MALCOLM A. HEINICKE
18 KATHLEEN M. McDOWELL
19 J. RAZA LAWRENCE

20 By: _____

21 Attorneys for Defendants
22 WACHOVIA FINANCIAL SERVICES,
23 WACHOVIA MORTGAGE
24 CORPORATION, WACHOVIA SERVICES,
25 INC., WORLD MORTGAGE COMPANY,
26 WACHOVIA COMMERCIAL MORTGAGE,
27 INC., WORLD SAVINGS, INC.,
28 WACHOVIA EQUITY SERVICING, LLC,
 WACHOVIA BANK, N.A., and WACHOVIA
 CORPORATION

1 DATED: March ____ , 2008
2

INITIATIVE LEGAL GROUP LLP
MARK YABLONOVICH
MARC PRIMO
REBECCA LABAT

3
4
5
6
7 DATED: March 14, 2008
8

Attorneys for Plaintiff
RONALD CHIN

9 MUNGER, TOLLES & OLSON LLP
10 MALCOLM A. HEINICKE
11 KATHLEEN M. McDOWELL
12 J. RAZA LAWRENCE
13

14 By: /s/ Malcolm A. Heinicke
15

16 Attorneys for Defendants
17 WACHOVIA FINANCIAL SERVICES,
18 WACHOVIA MORTGAGE
19 CORPORATION, WACHOVIA SERVICES,
20 INC., WORLD MORTGAGE COMPANY,
21 WACHOVIA COMMERCIAL MORTGAGE,
22 INC., WORLD SAVINGS, INC.,
23 WACHOVIA EQUITY SERVICING, LLC,
24 WACHOVIA BANK, N.A., and WACHOVIA
25 CORPORATION
26
27
28